

DANIEL BRODERICK, Bar #89424
Federal Defender
LINDA C. HARTER, Bar #179741
Chief Assistant Federal Defender
CARO MARKS, Bar #159267
Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorneys for Defendant
MICHAEL LABRECQUE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. Cr-S-03-384 WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	JUDGMENT AND SENTENCING
v.)	
)	
MICHAEL LABRECQUE, et al.)	Date: April 6, 2009
)	Time: 8:30 a.m.
Defendants.)	Judge: Hon. William B. Shubb
)	
_____)	

MICHAEL LABRECQUE, by and through his counsel, Caro Marks, Allan Harrod, by and through his counsel, Bruce Locke, and the United States of America, by and through its counsel, Laurel White, hereby stipulate and agree to continue the Judgment and Sentencing date presently scheduled for March 2, 2009, to April 6, 2009 at 8:30 a.m..

Defense Counsel Caro Marks was expected back to the office toward the end of January, but has suffered an unanticipated medical setback and will not be back until March 2009. Because she is expected to return in March, it is not felt that it would be cost effective to reassign Mr. Labrecque's case to another attorney.

Additionally, Ms. Marks will need additional time to March 16, 2009

1 in order to prepare her reply and to prepare for sentencing.

2 Defendants Labrecque and Harrod have been advised of this
3 continuance and their signature below acknowledges their agreement.

4 All defense counsel and counsel for the government concur in the
5 need for this continuance.

6 Dated: January 29, 2009

Respectfully submitted,

7 DANIEL BRODERICK
8 Federal Defender

9 */s/ Linda C. Harter for*

10 CARO MARKS
11 Assistant Federal Defender
12 Attorney for Defendant
MICHAEL LABRECQUE

13 */s/ Michael Labrecque*

14 MICHAEL LABRECQUE
15 Defendant

16 */s/ Bruce Locke*

17 BRUCE LOCKE
18 Attorney at Law
19 Attorney for Defendant
ALLAN HARROD

20 */s/ Allan Harrod*

21 Defendant

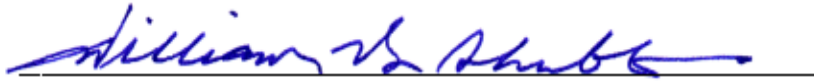
22 */s/ Laurel White*

23 LAUREL WHITE
24 Assistant United States Attorney
25
26
27
28

ORDER

IT IS SO ORDERED.

Dated: January 29, 2009

A handwritten signature in blue ink, reading "William B. Shubb", is written over a horizontal line.

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE